

## Public Notice Submission

**Provider Name:** Piedmont Rural Telephone Cooperative, Inc.

**Summary:** The request of any applicant to build facilities in Piedmont Rural Telephone Cooperative, Inc. service area should not be considered for funding because, as shown in the attached worksheets, Piedmont Rural Telephone Cooperative, Inc. currently provides sufficient high-speed broadband internet service in the pertinent Census blocks/tracts. Specifically, 96% of households have broadband available. In addition to services being provided by other carriers operating in the area, Piedmont Rural Telephone Cooperative, Inc., alone, has 39% of broadband subscribership throughout our service area. The highest available speeds are 10 MB downstream and 1 MB upstream, which exceed the minimum threshold set forth in the Notice of Funds Availability ("NoFA") published by NTIA for Round 2 BTOP funding. Moreover, Piedmont Rural Telephone Cooperative, Inc. provides broadband services at competitive market rates, as demonstrated by our significant subscriber penetration rates. Additionally, applications proposing to provide service in our territory do not meet the NoFA's definition of "underserved" or "unserved" area.

Moreover, funding of this application would overbuild existing broadband infrastructure. Please refer to the completed Points of Presence worksheet which illustrates where middle mile services are available throughout our service territory.

Finally, the most important criterion for NTIA to consider in awarding Comprehensive Community Infrastructure/Middle Mile projects, according to the NoFA, is whether the project "will deploy Middle Mile broadband infrastructure with a commitment to offer new or substantially upgraded service to community anchor institutions." Funding of this application is unnecessary because facilities are already in place to provide services to anchor institutions located within the area, and most, if not all, are already receiving services at speeds of their choosing.

All institutions of higher learning, including public and private universities and community and technical colleges, are 100% covered by fiber and may obtain speeds as desired up to 1 Gb. Likewise, 100% of K-12 schools and libraries are currently being served with broadband services.

All hospitals located within our service territory are connected with fiber at desired speeds of their choosing up to 100 Mb.

Any other health care providers or facilities located within the area also have available sufficient connectivity capable of being deployed at the desired speeds of those providers and facilities.